

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

:

In re: :

: Chapter 11

KOLESZAR FARM, LLC, :

: Bankruptcy No. 21-11653-AMC

Debtor. :

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**REMOTE WITNESS LIST AND EXHIBIT LIST
OF THE UNITED STATES TRUSTEE
FOR HEARING SCHEDULED ON NOVEMBER 14, 2021**

In accordance with this Court's Order Governing Procedures at Evidentiary Hearing scheduled for November 4, 2021, the United States trustee, by and through the undersigned counsel, hereby submits the following disclosures regarding his Motion to Dismiss and his Objection to retention of counsel.

I. WITNESS LIST:

- a. *Name of Remote Witness #1:* Roger Ashodian (only as to counsel's retention application).
- b. *Summary of Testimony:*

Witness to testify as to his representation of Debtor, Judith Antunes, and Manual Antunes, as well as any services which he has previously rendered to said parties in connection with this and other matters, any money charged and owed to him from said parties, his terms of engagement in this and other matters for said parties, and as to matters and facts relating to conflicts and disinterestedness of counsel.

- c. *Witness Email:* rashodian@schollashodian.com
- d. *Location of Witness:* Unknown

- e. *Place of Witness at Time of Testimony:* Unknown
- f. *Persons in Room with Witness at Time of Testimony:* Unknown
- g. *Documents Other than Those Set Forth on Exhibit List which Witness will Have Access:*
Unknown.

- a. *Name of Remote Witness #2:* Judith Antunes
- b. *Summary of Testimony:* Witness to testify generally as to her and her family's past, present and future finances, particularly as to her and her family members' prior bankruptcy filings, her and her family members' acquisition and transfer of property designated as 368 Pineville Road, Newtown, PA, related mortgage obligation(s) and foreclosure proceedings thereon, as well as her and her family members' interaction with parties holding the mortgage obligation(s) on said property, the facts related to the formation of the debtor, her and her family members' past and present engagements of Attorney Ashodian, the nature and extent of services which he performed and for which he was paid or is owed compensation, as well as with respect to the instant bankruptcy filing, the formation of the debtor, the transfer to title to said property, and state court foreclosure proceedings. Also, the witness is to testify as to the debtor's formation, financial obligations and debtor's financial transactions and operations since the time of filing.

- c. *Witness Email:* Unknown
- d. *Location of Witness:* Unknown
- e. *Place of Witness at Time of Testimony:* Unknown
- f. *Persons in Room with Witness at Time of Testimony:* Unknown
- g. *Documents Other than Those Set Forth on Exhibit List which Witness will Have Access:*
Unknown.

II. EXHIBIT LIST:

- 1, Bankruptcy Case Docket
- 2a. Retention Application of Roger Ashodian
- 2b. Declaration of Judith Antunes (part of Retention Application)
- 2c. Ashodian's Verification (part of Retention Application)

3. Deed transferring property at 368 Pineville Road, Newtown, PA to Debtor
4. Note from Manual A. Artunes to American Mortgage Network, Inc. dated August 7, 2007 in connection with mortgage of property at 368 Pineville Road, Newtown, PA.
5. Mortgage from Manual A. Artunes and Judith M. Artunes to American Mortgage Network, Inc. dated August 7, 2007 encumbering property at 368 Pineville Road, Newtown, PA. recorded August 31, 2007 at Instrument #2007080986.
6. Monthly Operating Reports filed for June 2021
7. Audio recording of Meeting of Creditors
8. Debtor's Petition
9. Debtor's Corporate Resolution
10. Debtors Schedule A/B
11. Debtor's Schedule D
12. Debtor's Schedule E/F
13. Debtor's Schedule G
14. Debtor's Schedule H
15. Debtor's List of 20 Largest
16. Debtor's Statement of Financial Affairs
17. Debtor's List of Equity Holders

Respectfully submitted,

October 27, 2021

Andrew R. Vara
UNITED STATES TRUSTEE
For Regions 3 and 9

BY: /s/ George M. Conway
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